

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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CITY OF ALMATY, KAZAKHSTAN and	:
BTA BANK, JSC,	:
	: Case No. 19-civ-02645
Plaintiffs,	:
	:
-against-	: <b>DECLARATION OF JILL</b>
	: <b>LEVI IN SUPPORT OF</b>
FELIX SATER, DANIEL RIDLOFF, BAYROCK	: <b>MOTION TO DISMISS</b>
GROUP INC., GLOBAL HABITAT SOLUTIONS,	: <b><u>AMENDED COMPLAINT</u></b>
INC., RRMI-DR LLC, FERRARI HOLDINGS	:
LLC, and MEM ENERGY PARTNERS LLC,	:
	:
Defendants.	:
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**JILL LEVI**, declares as follows:

1. I am a member of Todd & Levi, LLP, attorneys for Defendants Felix Sater (“Sater”), Daniel Ridloff (“Ridloff”), Bayrock Group Inc., (“Bayrock”), Global Habitat Solutions, Inc. (“GHS”) and RRMI-DR LLC (“RRMI”) (collectively, the “Moving Defendants”). I submit this Declaration in support of the Moving Defendants’ motion to dismiss the First Amended Complaint dated August 30, 2019 (the “Amended Complaint”) pursuant to Rule 12 (b) (6) of the Federal Rules of Civil Procedure.

2. I attach hereto as Exhibit A, a true and correct copy of the Amended Complaint.

I declare under the penalties of perjury that the foregoing is true and correct.

Dated: New York, New York  
October 11, 2019

s/Jill Levi  
Jill Levi